

SETH GINSBERG
ATTORNEY AT LAW

January 31, 2012

Honorable Sterling Johnson, Jr.
United States District Judge
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Angelo Ruggiero, 09-cr-135 (SJ)

Dear Judge Johnson:

At our request, your Honor extended the due date for defendant's motions until February 10, 2012. In making that request, however, I neglected to request that the Court also postpone the status conference scheduled for February 2, 2012, which was set with the expectation that motions would be fully briefed prior to the conference. Accordingly, after consultation with the government, we propose the following schedule:

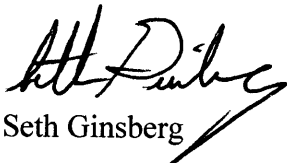
Defense Motions Due:	February 10, 2012
Government Opposition:	March 2, 2012
Defense Reply:	March 9, 2012

If the Court is available, the parties are available for a conference during the week of March 19, 2012, with the exception of March 21, 2012. If it is convenient for the Court, government counsel are scheduled to appear before your Honor for a conference in *United States v. Burke* on March 22, 2012 and would be available to address this case at that time as well.

Should the Court grant this application, we consent to the exclusion of time for Speedy Trial purposes until the date of the conference.

We thank the Court in advance for consideration of this request.

Respectfully,



Seth Ginsberg

cc: AUSA Jacquelyn Kasulis (via ECF)
AUSA Whitman Knapp (via ECF)